

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
JARED L. GRIMMER
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336/Fax: (702) 388-6418
jared.l.grimmer@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANTOS TORRES-NOVERON,
aka "Santos Roman Torres-Noveron,"
aka "Santos Ramon Torres-Noveron,"

Defendant.

Case No. 2:22-mj-00468-BNW

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Jeremy C. Baron, Assistant Federal Public Defender, counsel for Defendant SANTOS TORRES-NOVERON, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

1 extended to the defendant a plea offer in which the parties would agree to jointly request an
2 expedited sentencing immediately after the defendant enters a guilty plea.

3 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
4 history until after the defendant enters his guilty plea unless the Court enters an order
5 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
6 a defendant's initial appearance when charged by indictment.

7 3. The U.S. Probation Office informs the government that it would like to begin
8 obtaining the criminal history of defendants eligible for the early disposition program as
9 soon as possible after their initial appearance so that the Probation Office can complete the
10 Presentence Investigation Report by the time of the expected expedited sentencing.

11 4. Accordingly, the parties request that the Court enter an order directing the
12 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

13 DATED this 14th day of June, 2022.

14 Respectfully Submitted,

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16 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

17
18 /s/ Jeremy C. Baron
JEREMY C. BARON
19 Assistant Federal Public Defender
Counsel for Defendant SANTOS
20 TORRES-NOVERON

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SANTOS TORRES-NOVERON,
7 aka "Santos Roman Torres-Noveron,"
8 aka "Santos Ramon Torres-Noveron,"

9 Defendant.

Case No. 2:22-mj-00468-BNW

**Order Directing Probation to
Prepare a Criminal History Report
[Proposed]**

10 Based on the stipulation of counsel, good cause appearing, and the best interest of
11 justice being served:

12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
13 report detailing the defendant's criminal history.

14 DATED this 16th day of June, 2022.

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16 BRENDA N. WEKSLER
17 UNITED STATES MAGISTRATE JUDGE
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